

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

KONINKLIJKE PHILIPS N.V. and
PHILIPS LIGHTING NORTH AMERICA
CORPORATION,

Plaintiffs,

v.

WANGS ALLIANCE CORPORATION
d/b/a WAC LIGHTING CO.,

Defendant.

CIVIL ACTION NO. 1:14-cv-12298-DJC

PLAINTIFFS' UNOPPOSED MOTION TO IMPOUND

Pursuant to Local Rule 7.2(d) and Plaintiffs Koninklijke Philips N.V. and Philips Lighting North America Corporation (collectively, "Philips Lighting") hereby move this Court for an order permitting exhibits C, F, H, and I to the Declaration of C. Brandon Rash in Support of Philips Lighting's Opposition to WAC's Motion to Compel the Production of Prior Art to be filed under seal.

In support of this motion, Plaintiffs state as follows:

1. Exhibits C, F, H, and I to the Declaration of C. Brandon Rash in Support of Philips Lighting's Opposition to WAC's Motion to Compel the Production of Prior Art contain information of the parties that is "Confidential" or "Attorneys Eyes Only" under the Protective Order.
2. Philips Lighting requests leave to file exhibits C, F, H, and I to the Declaration of C. Brandon Rash in Support of Philips Lighting's Opposition to WAC's Motion to Compel the Production of Prior Art under seal in order to preserve the confidential nature of the information contained therein.

3. The granting of this motion is otherwise in the interest of justice.
4. Plaintiffs request that exhibits C, F, H, and I to the Declaration of C. Brandon Rash in Support of Philips Lighting's Opposition to WAC's Motion to Compel the Production of Prior Art be impounded until sixty (60) days after the entry of final judgment herein. Thereafter, the confidential information shall be returned to counsel for the party who filed it, who shall retain it subject to further order of the Court, for thirty (30) days after the final termination of this action, including any applicable appeal period.
5. Plaintiffs' counsel hereby certifies under Local Rule 7.1 that Plaintiffs' counsel conferred with counsel for Defendant regarding this motion. The parties have agreed that by not opposing this motion, Defendant does not waive (and Plaintiffs shall not argue that Defendant waived) its right to challenge the underlying claim of confidentiality of any of the material sought to be sealed. On that basis, Defendant does not oppose the filing of this motion.

Dated: July 28, 2017

Respectfully submitted,

/s/ C. Brandon Rash
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Attorneys for Plaintiffs
Koninklijke Philips N.V. and
Philips Lighting North America Corporation

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as nonregistered participants on July 28, 2017.

/s/ C. Brandon Rash
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